

Capital Sky have designed our company confidentiality policy to explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, sub-contractors and our company. We want to make sure that this information is well-protected. This policy affects all employees, including senior management, contractors and volunteers, who may have access to confidential information.

We must protect this information for two reasons:

- Be legally binding (e.g. sensitive customer data.)
- Constitute the backbone of our business, giving us a competitive advantage (e.g. business processes.)

Policy elements

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Clients /Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential
- Employees may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information always
- Shred confidential documents when they are no longer needed
- Make sure they only view confidential information on secure devices issued by Capital Sky
- Only disclose information to other employees when it is necessary and authorised
- Keep confidential documents inside our company's premises unless it is absolutely necessary to move them

What employees should not do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our company
- Replicate confidential documents and files and store them on insecure devices
- When employees stop working for our company, they are obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures

Capital Sky will take measures to ensure that confidential information is well protected.

We will:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Ask for authorization by senior management to allow employees to access certain confidential information

Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests, it as part of an investigation or audit
- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, employees involved should document their disclosure procedure and collect all needed authorisations. We are bound to avoid disclosing more information than needed.

Disciplinary Consequences

Employees who do not respect our confidentiality policy will face disciplinary and, possibly, legal action.

We will investigate every breach of this policy. We will terminate any employee who wilfully or regularly breaches our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness. We will terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

This policy is binding even after separation of employment.

Signature


Martin Maloney
Managing Director

Date 16/05/2023

Next Review 16/05/2024